LAW OFFICES

PETER W. TILL

105 MORRIS AVENUE, SUITE 201 SPRINGFIELD, NEW JERSEY 07081 (973) 258-0064

PETER W. TILL Admitted to NJ & DC Bar

JOHN V. SALIERNO 0 Admitted to NJ & NY Bar

♦ CERTIFIED BY THE NJ SUPREME COURT AS A CIVIL TRIAL ATTORNEY

Facsimile: (973) 258-0478 Email: pwt@till-law.com www.till-law.com

January 24, 2025

Filed via ECF

Magistrate Judge Anne Y. Shields United States District Court for the Eastern District of New York 100 Federal Plaza, Courtroom 840 Post Office Box 840 Central Islip, New York 11722

> Re: Luis Alberto Ocampo and Carlos Jimenez, on behalf of

> > themselves, individually, and on behalf of all others

similarly-situated

Guaranteed Home Improvement LLC, and Justin Romano, Against:

individually, and Abraham Finkler, individually, and

Ricardo Martinex, individually **United States District Court Eastern District of New York**

Case: 2:24-cv-06980(AYS)

Dear Magistrate Judge Shields:

In connection with the above captioned matter this office has and continues to represent the Defendants.

We are writing to advise the Court that we are certain that this office has never missed an appearance before the many venues in which we practice.

On December 18, 2024 we wrote to the Court requesting a Court Conference.

On December 19, 2024 we were advised for the first time that this matter had been Reassigned to Judge Ann M. Donnelly and Your Honor.

On December 23, 2024 we resubmitted correspondence requesting permission to file a Motion.

Magistrate Judge Anne Y. Shields United States District Court for the Eastern District of New York January 24, 2025 Page 2

On January 3, 2025 an Order was entered granting the Motion for Pre-Motion Conference (for February 20, 2025 at 3:00 p.m.)

On January 13, 2025 we were again notified that this matter was reassigned to Judge Sanket J. Bulsara.

On January 16, 2025 we were advised that the pre-motion conference (previously scheduled for February 20, 2025 at 3:00 p.m.) was adjourned for the second time and the parties may refile their motions for a pre-motion conference pursuant to Judge Bulsara's procedural rules. We will re-file our papers no later than January 30, 2025.

Accordingly, please accept my respectful apology for January 23, 2025, and we will be before the Court on February 25, 2025, at 12:00 noon for an Initial Conference.

Respectfully submitted,

LAW OFFICES OF PETER W. TILL

/s/ Peter W. Till

Peter W. Till

PWT:JVS:cc

cc: Michael J. Borrelli, Esq. (<u>mjb@employmentlawyernewyork.com</u>)
Alexander T. Coleman, Esq. (<u>atc@employmentlawyernewyork.com</u>)